



## FOSTER WHEELER ENVIRONMENTAL CORPORATION

April 4, 1997  
1284-0006-97-0315  
No Response Required

Ms. Christi Davis  
Department of the Navy  
Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway, Mail Stop #82  
Lester, PA 19113-2094

Subject: NORTHDIV REMEDIAL ACTION CONTRACT NO. N62472-94-D-0398  
DELIVERY ORDER NO. 0006 - MOD 04 - NCBC DAVISVILLE, RHODE ISLAND  
RESPONSES TO EPA TECHNICAL REVIEW COMMENTS ON THE CLOSE-OUT  
REPORT FOR THE REMOVAL ACTION AT SITE 10

Dear Ms. Davis:

Presented below are Foster Wheeler Environmental's responses to review comments from the U.S. Environmental Protection Agency (EPA) Region I on the Close-out Report for the Removal Action at Site 10, issued on January 20, 1997. The reviewer's comments appear in italic type, followed by Foster Wheeler's responses in bold type.

Reviewer: C. Williams, EPA Region I

Date: March 11, 1997

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*Comment 1: One major omission was noted within the report. There is no discussion, supporting documentation, or analytical data which supports waste characterization. The report needs to clearly present documentation utilized to properly characterize the waste removed.*

**Response 1: TRC Environmental Corporation collected samples within the disposal areas at Site 10 during the Phase I and Phase II Remedial Investigations. The Phase I Remedial Investigation, conducted from September 1989 to March 1990, included the performance of a limited soil gas survey, the collection of six surface soil samples, the advancement of two soil borings, and the installation and sampling of three groundwater monitoring wells. All soil and groundwater samples were submitted for full TCL/TAL analyses, and it was concluded that there was no significant source of contamination at the site. To verify this conclusion, a Phase II Remedial Investigation at Site 10 was conducted from December 1992 to August 1993. Phase II Remedial Investigation activities included a soil gas survey, a geophysical survey, surface soil sampling, subsurface soil sampling, and groundwater sampling. All soil and groundwater samples were analyzed for full TCL less pesticides/PCBs and TAL parameters. It was determined that soil quality did not pose a significant concern under continued military use or potential commercial/industrial site use. Site 10 analytical results are summarized in TRC Environmental Corporation's Remedial Investigation Report, issued July 1994.**

**Comment 2:** *Section 3.0, Removal Action Activities, 4th paragraph: The report indicates that a wetland survey was performed "at, or in close proximity to, the three disposal areas". Clarification should be provided as to what constitutes "close proximity".*

**Response 2:** **"Close proximity" constitutes approximately 200 feet. No wetlands were found at, or within 200 feet of, the three disposal areas at Site 10.**

**Comment 3:** *Section 4.0, Transportation and Disposal: This section identifies the waste that was removed from the site, its quantity, and final disposition of the waste. There is no mention whether a waste characterization analysis was performed on the waste removed. Based on the limited descriptions of the waste material found, no inference can be made whether or not the waste material contained hazardous constituents. Further description of the waste should be provided. Specifically, was the wood debris painted, and if so, was lead analysis performed on the wood debris? Did the glassware constitute what is typically found in laboratories? If no waste characterization was performed on the waste prior to disposal, justification for not analyzing the waste should be provided, possibly citing analytical data from previous site investigations.*

**Response 3:** **Foster Wheeler performed the removal action at Site 10 in accordance with the Statement of Remediation Services and approved Final Work Plan, neither of which included a waste characterization analysis of the debris. The waste at the site included construction debris (unpainted wood and scrap metal) and municipal-type waste (primarily ceramic tableware and glass bottles). Please refer to Response 1 for information obtained from previous site investigations.**

**Comment 4:** *Appendix B, Photographs: The appendix includes a series of photographs of the site location "after" the completion of the removal. For better documentation and clarification as to the scope of activities, it may be prudent to also include photographs, if available, taken before the removal activities were undertaken for comparison.*

**Response 4:** **Unfortunately, no photographs were taken before or during the removal action activities at Site 10.**

**Comment 5:** *Appendix C, Wetland Survey at Camp Fogerty Disposal Area, Site 10, 2nd paragraph: The second paragraph describes the site layout. In contradiction to the text within the Close-out Report, this paragraph states there are four disposal area referred to as areas A, B, C, and D. The Close-out text refers to only three disposal areas designated areas 1, 2, and 3. These reports should be consistent and the areas referred to with similar nomenclature.*

**Response 5:** **Area A corresponds to Disposal Area 1; Area B corresponds mainly to the concrete portion of Disposal Area 2; Area C corresponds mainly to the scrap metal portion of Disposal Area 2; and Area D corresponds to Disposal Area 3.**

**Comment 6:** *Appendix C, Wetland Survey at Camp Fogerty Disposal Area, Site 10, 2nd paragraph: Additionally, the Results and Discussions section within this appendix describes the results of augering which was apparently performed within the boundaries of the disposal area. In three of the four locations, augers encountered fill at or immediately below the ground surface which restricted auger penetration. These areas were obviously disturbed from past construction or disposal activities. It is not clear why no*

*effort was made to auger outside of the disposal areas to characterize the native soil types adjacent to these disposal areas. It is recommended that further discussion be provided to explain the rational for limiting the subsurface characterization activities to the disposal areas.*

**Response 6:** The wetland survey was performed primarily to confirm that there were no wetlands present within the disposal areas, and that Foster Wheeler would not be disturbing wetland areas during the removal action. Thus, soil characterization was mainly limited to these areas of interest (the disposal areas). Based on visual observation, additional soil characterization was performed where necessary to rule out the presence of wetlands within 200 feet of the disposal areas.

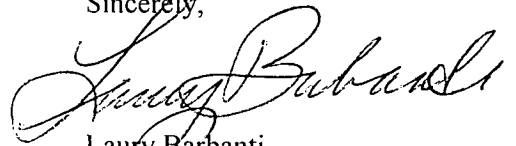
*Comment 7: Appendix C, Results and Discussion Section, 3rd paragraph: The word "of" should be inserted between the words "comprised" and "large".*

**Response 7:** Since a revised final report will not be issued, this editorial comment will not be incorporated.

*Comment 8: Appendix C, last paragraph, 2nd to last sentence: The word "to" should be inserted between the words "Due" and "the".*

**Response 8:** Since a revised final report will not be issued, this editorial comment will not be incorporated.

Sincerely,



Laury Barbanti  
Delivery Order Manager

cc: P. Otis, NORTHDIV      R. Gottlieb, RIDEM  
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